



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

November 2, 2015

Robert G. Macwhorter, Forest Supervisor  
Rogue River-Siskiyou National Forest  
3040 Biddle Road  
Medford, Oregon 97504

Dear Mr. Macwhorter:

We have reviewed the Rogue River-Siskiyou National Forest's September 2015 Final Supplemental Environmental Impact Statement and draft Record of Decision for Motorized Vehicle Use on the Rogue River-Siskiyou National Forest (EPA Region 10 Project Number 08-053-AFS). Our review was conducted in accordance with the EPA's responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

The EPA submitted comments on this project in 2008, 2009, 2010 and 2011. Our 2011 comments noted the Forest's responsiveness to all of our previous recommendations.

Our 2011 comments also included a new recommendation to increase the effectiveness of mitigation for Naturally Occurring Asbestos (NOA). We suggested additional information on how site-specific asbestiform fiber analysis would be considered in ongoing travel management decisions. The 2015 FSEIS and draft ROD is responsive because of new language committing to site-specific analysis "...prior to the change being implemented and reflected in the MVUM (*Motor Vehicle Use Map*). Results of testing would be incorporated into NOA forest information available to the public." The 2015 mitigation section also explicitly commits to this process for the conversion of Road 2509640 on the Wild Rivers Ranger District. We appreciate your close tracking and responsiveness to our recommendations on NOA over the course of this NEPA process.

We also appreciate that water quality and erosion has been a significant issue for the Forest throughout this NEPA process. Continuing through the 2015 FSEIS and draft ROD, where - for example - the Preferred Alternative increases the prevention of off-road damage to sensitive plants, wetlands, fens, and bogs by removing motorized use in the Eight Dollar Mountain area near the Illinois River.

Overall, we agree with your conclusion in the draft ROD that "...authorizing action for this project is clearly better than taking no action (doing nothing)." (p. 17). Eliminating cross-country travel, making numerous site-specific decisions to protect resources, and publishing an MVUM as the new Travel Map will result in a responsible combination of physical, biological, social and environmental benefits.

If you have any questions please contact me at (206) 553-1601, or [littleton.christine@epa.gov](mailto:littleton.christine@epa.gov). You may also contact Erik Peterson of my staff at (206) 553-6382, or [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,



Christine B. Littleton, Manager

Environmental Review and Sediment Management Unit